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June 7, 2021

**VIA ECF**

Hon. Denise L. Cote  
United States District Court  
Southern District of New York

*Grant Seal*

*June 11, 2021*

*Denise Cote*

Re: TransPerfect Global Inc. v. Lionbridge Technologies, Inc., et al., No. 1:19-CV-03283

Dear Judge Cote:

Plaintiff respectfully requests authorization to file under seal Exhibits A, B and C to Plaintiff's letter-motion dated June 7, 2021.

All three exhibits are expert reports strewn with references to Confidential and Highly Confidential documents that contain competitively sensitive business information of Lionbridge and TransPerfect. With limited exceptions, the producing parties have designated substantial sections of all three reports as Confidential or Highly Confidential pursuant to the Court's June 3, 2020 Stipulation and Order Regarding Confidential Discovery Material (the "Confidentiality Order") (ECF Doc. No. 78).

Plaintiff's motion references the full scope and content of certain expert reports. The sections of the reports not requiring redaction are largely limited to prefatory remarks of minimal significance or public interest outside the context of the reports as a whole. Plaintiff therefore requests that the exhibits be sealed in their entirety. In the alternative, Plaintiff requests leave of the Court to file redacted versions of the three reports, leaving unredacted the sections not identified by either party as containing sensitive business information.

Pursuant to Your Honor's Individual Practices, we have enclosed full, unredacted versions of the Exhibits, which have previously been provided to the Defendants.

We thank the Court for its consideration of this request.

Respectfully,

FOSTER GARVEY PC

/s/ Malcolm Seymour  
Malcolm Seymour (MS-3107)